

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

In The Matter of:

CHAD E. GIPSON
(SS#***-**-4217)
and

Case No. 13-58606-wsd
Chapter 7
Hon. Walter Shapero

HEATHER J. GIPSON,
fka HEATHER J. KANE
(SS#***-**-5615)

Debtors.

STATE OF MICHIGAN, DEPARTMENT OF
LICENSING & REGULATORY AFFAIRS,
UNEMPLOYMENT INSURANCE AGENCY,

Plaintiff,

v

CHAD E. GIPSON,

Defendant.

Adversary Proceeding No.:
14-04023-wsd
Hon. Walter Shapero

PLAINTIFF'S INITIAL DISCLOSURE STATEMENT

Plaintiff State of Michigan, Department of Licensing & Regulatory Affairs, Unemployment Insurance Agency submits the following initial disclosures under Fed. R. Civ. P. 26(a)(1):

1. Names, addresses and phone numbers of individuals likely to have discoverable information:

- a. Linda Dixon and/or Doris Mitchell
Unemployment Insurance Agency
Benefit Overpayment Collection Unit
PO Box 77000
Detroit, MI 48277-1760
1-800-638-6372
Restitution & penalties calculation & balances

b. Representative of McIntosh Grounds Maintenance
3090 Judd Rd
Milan, MI 48160
(734) 487-8940
Earnings & other employment information

c. Chad E. Gipson, Defendant

2. Documents that may be used to support Plaintiff's claims:

- a. Unemployment Insurance Agency determinations issued on May 30 and 31, 2012, finding that Defendant had been overpaid benefits as a result of his failure to report his earnings and his failure to report his separation from McIntosh Grounds Maintenance, and imposing restitution and fraud penalties.
- b. Unemployment Insurance Agency statements of charges to McIntosh Grounds Maintenance's employer account.
- c. Three letters from McIntosh Grounds Maintenance dated April 5, 2012, to the Unemployment Insurance Agency, with attached earnings information for Defendant.
- d. Request for Employer Report of Unemployed Worker Earnings sent by the Unemployment Insurance Agency to McIntosh Grounds Maintenance on April 18, 2012.
- e. Letter dated April 23, 2012, from McIntosh Grounds Maintenance to the Unemployment Insurance Agency, with attached earnings information for Defendant.
- f. Letter dated May 7, 2012, from McIntosh Grounds Maintenance to the Unemployment Insurance Agency, with attached earnings information for Defendant.
- g. Predetermination Proceedings Notifications sent to Defendant by the Unemployment Insurance Agency on May 7, 2012.
- h. Inquiry Regarding Possible Overpayment Due to Intentional Misrepresentation (Fraud) sent to Defendant by the Unemployment Insurance Agency on May 11, 2012.

- i. Letter dated May 21, 2012, from McIntosh Grounds Maintenance to the Unemployment Insurance Agency.
- j. Acknowledgement of Protest sent to McIntosh Grounds Maintenance by the Unemployment Insurance Agency on May 24, 2012.
- k. Letter dated June 5, 2012 from McIntosh Grounds Maintenance to the Unemployment Insurance Agency.

3. Computation of damages

Restitution of \$3,133.00, fraud penalties of \$12,301.00, statutory interest of \$439.00, for a total of \$15,893.77, plus \$293.00 in court filing fees.

4. Insurance

Not applicable.

Respectfully submitted,
Bill Schuette
Attorney General

/S/ Amy L. Rosenberg
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Dated: March 26, 2014